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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

ALEXSAM, INC.,

Plaintiff,

vs.

WAGeworks, INC.,

Defendant.

Case No. 3:19-cv-04538-EMC

**L.R. 6-1(a) STIPULATION TO EXTEND
TIME TO RESPOND TO INITIAL
COMPLAINT**

Complaint Filed: August 2, 2019
Complaint Served: August 15, 2019
Current Response Due: Sep. 5, 2019
New Response Date: Oct. 7, 2019

Pursuant to Local Rule 6-1(a), Plaintiff AlexSam, Inc. (hereinafter, "Plaintiff") and Defendant WageWorks, Inc. (hereinafter, "Defendant") by and through their respective counsel, hereby stipulate and agree as follows:

1. WHEREAS, Plaintiff filed the above-captioned case on August 2, 2019 (Dkt. No. 1);
2. WHEREAS, Plaintiff served its Complaint on Defendant on August 15, 2019;
3. WHEREAS, Defendant is required to answer or otherwise respond to the Complaint by September 5, 2019;
4. WHEREAS, counsel for the parties have jointly agreed, subject to the approval of the Court, to a 30-day extension for Defendant to answer or otherwise respond to the Complaint;
5. WHEREAS, the parties believe that good cause exists for this extension for a number of reasons, including the Labor Day holiday, and counsel's early evaluation of the case;
6. WHEREAS, there have been no prior extensions of time for Defendant to respond to the Complaint;
7. WHEREAS, no party will be prejudiced by the relief sought;

1 8. WHEREAS, trial will not be delayed because the Court has not set any trial date, and
2 this brief extension will not impact other deadlines in this case; and

3 9. WHEREAS, the present extension is not sought for any improper purpose.

4 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED BY THE PARTIES that
5 the time for Defendant to answer or otherwise plead to the Complaint in the above-captioned action
6 shall be, and hereby is, extended by 30 days, to October 7, 2019.¹

7 Dated: August 27, 2019

Respectfully submitted,

8 By: /s/ Steven W. Ritcheson
9 Steven W. Ritcheson, Esq. (SBN 174062)
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ATTORNEYS for Plaintiff *AlexSam, Inc.*

14 Dated: August 27, 2019

Respectfully submitted,

15 By: /s/ Vera Elson
16 Vera M. Elson, Esq. (SBN 156327)
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ATTORNEYS for Defendant *WageWorks, Inc.*

28 ¹ 30 days from September 5, 2019 is Saturday, October 5, 2019.